

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

BEACON POWER, LLC,

Plaintiff,

vs.

SOLAREGE TECHNOLOGIES, INC., and
IMAGINESOLAR LLC (doing business as
IMAGINESOLAR),

Defendants.

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CIVIL ACTION NO. 5:15-cv-00020-FB

Jury Trial Demanded

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE RESPOND TO ORIGINAL COMPLAINT FOR
PATENT INFRINGEMENT**

Defendant ImagineSolar LLC (doing business as ImagineSolar) hereby files this
Unopposed 30-day Motion for Extension of Time to Answer or Otherwise Respond to Plaintiff's
Original Complaint for Patent Infringement and states as follows:

1. Plaintiff filed the Complaint in the above captioned matter on January 9, 2015 (Dkt. 1).
2. The current date to answer or otherwise respond to the Complaint is March 5, 2015.
3. This brief extension will not prejudice any party, nor will it unduly delay these proceedings.
4. The new due date to answer or otherwise respond to the Complaint would be April 4, 2015.
5. Plaintiff, through its counsel, agrees to this extension of time.

Respectfully submitted

Dated: March 3, 2015

/s/ Steven R. Daniels

Steven R. Daniels, Texas Bar No. 24025318

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Attorneys for Defendant

ImagineSolar LLC

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Defendant, ImagineSolar LLC conferred with Plaintiff's counsel, and Plaintiff agrees to this motion.

Dated: March 3, 2015

/s/ Steven R. Daniels

Steven R. Daniels

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record, who are deemed to have consented to electronic service are being served March 3, 2015, with a copy of this document via the Court's CM/ECF system.

/s/ Steven R. Daniels

Steven R. Daniels